

EXHIBIT C



ATTORNEYS AT LAW

January 27, 2019

James Spielberger ‡†
 Gabrielle Klepper *† † ★ † ‡
 Lisa Scheibly *
 Zane Herman *
 Jeffrey Del Rio * ‡ ‡
 Christopher A. Fennell *
 Abby Salzer * ▲
 Gary Martoccio * ‡ ★ † ‡ ‡ ‡
 Joshua Robert Rich * ‡
 Eric D. Rogers * †
 Eric Bossardt *
 Samuel Doxsee *

VIA EMAIL: chargov@eeoc.gov
EEOC CHARLOTTE DISTRICT OFFICE
 129 West Trade Street
 Suite 400
 Charlotte, North Carolina 28202

RE: Employee: Alana Bailey (alanabailey2016@gmail.com)
Employer: Hiossen

Dear Sir or Madam:

Alana Bailey has retained this law firm to represent her in connection with her employment discrimination charge against Hiossen. Please direct all future correspondence, communications, and documents regarding this matter to our firm.

Our firm can be contacted at (800) 965-1570 ext. 106. Thank you in advance for your prompt attention to this matter.

Best regards,

A handwritten signature in black ink, appearing to read "G. Martoccio".

Gary Martoccio
Gary.martoccio@spielbergerlawgroup.com

OF COUNSEL:

♦

ONLY LICENSED IN:

† SC
 ‡ GA
 ▣ VA
 † NC
 * IL
 † TX
 * FL
 ★ AZ
 ‡ PA
 ‡ CO
 ▲ OH
 ▽ TN

cc: Samuel Doxsee, Esq.
 Alana Bailey

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Administrative Office: 4890 W. Kennedy Blvd. Suite 950, Tampa, Florida 33609

Phone: (800) 965.1570 Fax: (866) 580.7499

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: _____ Agency(ies) Charge No(s): _____ <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	
and EEOC			
<i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) Ms. Alana Bailey		Home Phone (Incl. Area Code) (704) 900-9131	Date of Birth 11/26/1967
Street Address 8306 Denholme Dr		City, State and ZIP Code Waxhaw, NC 28173	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name Hiossen		No. Employees, Members 500	Phone No. (Include Area Code) (888) 678-0001
Street Address Ms. Bailey worked from Local Branch: 6201 Fairview Rd., Ste 243, Charlotte, NC 28210 Corporate Office: 270 Sylvan Ave #1130, Englewood Cliffs, NJ 07632		City, State and ZIP Code	
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address		City, State and ZIP Code	
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input checked="" type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input checked="" type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 03/2019 Ongoing <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):			
<p>Statement of Harm: Hiossen has discriminated against me and continues to discriminate against me and treat me in a disparate manner based on my age, I am over the age of 40, and national origin, American.</p> <p>I began working for Hiossen in 2017. I am one of the oldest American female employees working in my region. Hiossen's sales force is predominantly made up of younger employees and Korean employees.</p> <p>Failure to Promote: Hiossen's Regional Director Danial Kang (Korean), clearly favors young Korean employees as they are regularly promoted, while older American employees, including me, are over looked by Hiossen. For example, Charles Yi and Sean Kim Sung are both younger Korean employees with less experience who were promoted, while I was ignored when I asked about being promoted to manage an office.</p> <p>Continued Page 2</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT	
<div style="display: flex; align-items: center;"> <div style="text-align: center; margin-right: 20px;"> 1/24/2020 Date </div> <div style="text-align: center;"> Charging Party Signature </div> </div>		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

CHARGE OF DISCRIMINATION

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Charge Presented To: _____ Agency(ies) Charge No(s): _____

☐ FEPA

☒ EEOC

_____ and EEOC

_____ State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

Continued from Page 1

In 2019, Hiossen implemented a business model and used the opportunity to escalate its harassment and discrimination. For example, soon after the new model was implemented, Hiossen further targeted me by reassigning the zip codes I worked in without notifying me. This reassignment was intended to drastically reduce my income as Hiossen removed some of the most lucrative zip codes I worked in including 28277. I had just secured two accounts in 28277 and had many promising prospects lined up. The change in zip codes severely hindered my sales numbers. By contrast, newer, younger employees were assigned larger accounts and more favorable zip codes that disproportionately advantaged younger employees in my Charlotte branch while more Korean employees were hired in our region.

Prior to the implementation of the Korean business model, I had been consistently meeting or exceeding my sale goals. After, Hiossen began to assign me higher and more unrealistic sales goals, while simultaneously limiting the zip codes I was able to work in. Hiossen also began to subject my work to heightened scrutiny and criticized my sales numbers, which Hiossen itself had intentionally hindered.

Additionally, my Branch Manager, Tim Johnson, who is Caucasian American, berates my sales numbers and regularly threatens to terminate me. Mr. Johnson does not berate employees outside of my protected classes in the same way.

Hiossen continues to subject me to discrimination and disparate treatment in the workplace.

Statement of Discrimination: I believe I have been discriminated against because of my age in violation of the Age Discrimination in Employment Act of 1967 and my national origin in violation of Title VII of the Civil Rights Act of 1964.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

I declare under penalty of perjury that the above is true and correct.

1/24/2020 Hana Pauley

Date

Charging Party Signature